

BEFORE THE  
Federal Communications Commission  
WASHINGTON, D.C.

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AUG 27 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Implementation of the Non-Accounting )  
Safeguards of Sections 271 and 272 of the )  
Communications Act of 1934, as amended; )

and )

Regulatory Treatment of LEC Provision )  
of Interexchange Services Originating in the )  
LEC's Local Exchange Area )

CC Docket No. 96-149

DOCKET FILE COPY ORIGINAL

To: Chief, Common Carrier Bureau

**MOTION FOR EXTENSION OF TIME**

The Telecommunications Industry Association ("TIA"), by its attorneys and pursuant to Section 1.46 of the Commission's rules, respectfully requests that the deadline for submission of reply comments in the above-captioned proceeding be extended until September 13.

The revised schedule established in the Commission's recent order granting a request for extension filed by the United States Telephone Association<sup>1</sup> provides that replies on all issues

<sup>1</sup> Order, In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended; and Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC's

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other than those covered by the Commission's Order must be submitted on or before August 30. Replies addressing the independent LEC issues identified in the Commission's Notice are now due September 13.

In preparing comments in response to the Commission's rulemaking proposals in the instant proceeding and in other proceedings implementing provisions of the Telecommunications Act of 1996 that affect the interests of its more than 500 members, TIA has employed a working group process which involves the collection and coordination of input from member companies. While this process has worked well in other proceedings, the timing and compressed nature of the reply period established in the Commission's Notice,<sup>2</sup> together with the volume of initial comments received by the Commission,<sup>3</sup> has made it difficult to secure the member participation and coordination needed to prepare and file reply comments addressing the full range of

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Local Exchange Area, CC Docket No. 96-149, DA 96-1281, released August 9, 1996 ("Extension Order").

- <sup>2</sup> The fifteen-day reply cycle established in the Commission's Notice is significantly shorter than that provided in many other Commission proceedings, which frequently allow 30 days for the submission of reply comments.
- <sup>3</sup> Approximately 40 parties have submitted more than 1,000 pages of initial comments addressing the broad range of implementation issues reflected in the Commission's Notice. Copies of the instant petition are being served by hand or via telecopier to all parties and Commission staff. Given the number of participants, TIA respectfully requests a waiver of the requirements of Section 1.46(c).

issues of concern to TIA's members within the prescribed timeframe.

As its initial comments indicate, TIA believes it is essential that the Commission make every effort to see that the rules developed in the instant proceeding address the manufacturing-related safeguard issues raised in the Notice in an effective, comprehensive manner. Grant of a brief extension which allows for the simultaneous submission of reply comments on **all** issues raised in this proceeding will not impair the Commission's ability to resolve these issues in a timely manner,<sup>4</sup> and will help to ensure that the Commission has a full record on which to base its determinations with respect to manufacturing-related issues in particular.

Respectfully submitted,

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August 27, 1996

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<sup>4</sup> As the Commission has previously noted, many of the issues related in the Notice are interrelated; moreover, there is no applicable statutory deadline for completion of the instant rulemaking. See Extension Order, ¶¶ 2-3.

**CERTIFICATE OF SERVICE**

I, Rosalyn Bethke, do hereby certify that on this 27th day of August, 1996, copies of the foregoing "Motion for Extension of Time" were delivered by first-class mail or by hand delivery, as indicated,<sup>1</sup> to the following parties:

  
\_\_\_\_\_  
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